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July 14, 2003

LaDonna Walker, 6SF-RA
Site Assessment Manager
U. S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

RE: SI REPORT FOR RAY WICHERT PROPERTY

Dear LaDonna:
Enclosed please find the Ray Wichert Property (CERCLIS ID No. OKD987095049) SI narrative, narrative reference package, Prescore file (on diskette only), Prescore Attachments, and Prescore reference package. The site score is 1.33. Metals, polynuclear aromatic hydrocarbons (PAHs), and pesticides were present in soil samples collected among the waste piles on the site. Arsenic and six of these PAHs were present in the samples at concentrations exceeding one or both of the following EPA Region 6 Human Health Medium-Specific Screening Levels: the residential risk-based screening level for contaminants in soil; and the industrial risk-based screening level for contaminants in soil.

I do not believe that the SI data are sufficient to document the potential threat that the waste sources on the Ray Wichert Property may pose to nearby targets, including residences, businesses, and a gymnastics school, all of which are located within 200 feet of the site. No soil samples were collected from any of these potential targets, so the impact of site wastes on these targets is unknown. Furthermore, the Prescore site score is very low because there are no hits for site related contaminants to enter in the targets block of the soil pathway of Prescore. In addition to these considerations, the soil sample data do not adequately characterize waste sources and potential soil and groundwater contamination on the Ray Wichert Property. For example, soil samples were not analyzed for radium, which is the primary contaminant of concern on the site. Furthermore, soil and groundwater samples were not collected from areas of the site that may have been impacted by petroleum products from the underground storage tanks (USTs) present on the site.

Given these considerations, I believe an expanded site inspection (ESI) of the Ray Wichert Property is warranted. The sampling plan for the ESI should focus on the following goals: (1) collection of surface soil samples among the waste piles on site and determination of the radium concentration in those samples; (2) collection of surface soil samples from the immediate vicinity of the USTs lying on site and determination of the PAH concentrations in those samples; (3) use of soil boring

equipment for the collection of deep soil and shallow groundwater samples from the south end of the site (where the USTs had been buried when the site was active) and determination of VOC and PAH concentrations in those samples; (4) collection of surface soil samples from nearby residences, businesses, pastures, and the gymnastics school to determine if radium or other contaminants (VOCs, PAHs) from the Ray Wichert Property have impacted those nearby targets; and (5) collection of sufficient background surface soil samples to determine if the PAHs and pesticides in soil on the Ray Wichert Property may be derived from sources other than those (waste piles, USTs) on the site. If access to the Ray Wichert Property is denied by the site owner(s), the ESI should, at the very least, collect the samples described in points 4 and 5 of this paragraph.

Please call me if you have questions.

Sincerely,

Kent Curtis

Kent Curtis, Environmental Specialist II, OES/ITEC

Enclosures

cc: OES File